

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

CYNTHIA K. HAYNES (a/k/a Cynthia K.)
Randolph), individually and under the Missouri)
Wrongful Death Statute)
)
Plaintiff,)
)
vs.) Case No: 1:21-CV-00160-SNL
)
JENNIFER WILLIAMS, individually, et al.)
)
Defendants.)

**CERTAIN DEFENDANTS' CONSENTED MOTION FOR ADDITIONAL TIME TO
FILE REPLIES IN SUPPORT OF THEIR MOTIONS TO DISMISS**

Come Now, Defendants, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law, Spain, Miller Galloway & Lee, LLC and Bernice Haynes ("Defendants"), by and through their undersigned counsel, and for their Consented Motion for Additional Time to File Replies in Support of their Motions to Dismiss the Amended Complaint for Damages, up through and including March 04, 2022, state:

1. On November 12, 2021 Plaintiff filed her Amended Complaint in this case.
2. Each of the Defendants requested and were granted additional time to file responsive pleadings, motions, and/or an answer to the Amended Complaint, up through and including January 18, 2022. (Docs. 12, 14, 16, 17, 19, 25).
3. On January 18, 2022, each of the Defendants filed motions to dismiss the Amended Complaint and memorandums of law in support of their motions to dismiss. (Docs. 29, 30, 31, 32, 33, 34).
4. Thereafter, Plaintiff requested and was granted additional time to file responses to the Defendants' motions to dismiss, up to and including February 17, 2022. Plaintiff also

requested and was granted leave to file a single memorandum of law consisting of twenty-five (25) pages in response to the Williams and Spain Miller Defendants Motions to Dismiss. (Docs. 35, 38).

5. On February 15, 2022, Plaintiff filed a memorandum in response to the Williams Defendants and Spain Miller Defendants' Motions to Dismiss. Plaintiff also filed a memorandum in response to Bernice Haynes' Motion to Dismiss.

6. Pursuant to local Rule 4.01(c), Defendants' replies in support of their motions to dismiss are due on February 25, 2022.

7. The Amended Complaint arises from events that occurred in a domestic relations matter that began in 2013 and to date remains unresolved. The Amended Complaint is seventy (70) pages long and includes two hundred-sixty-seven (267) paragraphs alleging wrongful death. The issues in this case concern multiple legal doctrines and complex questions of law.

8. Accordingly, Defendants respectfully request an extension of time of seven (7) days, up through and including March 04, 2022, to file replies in support of their motions to dismiss.

9. The additional time is necessary for Defendants to fully evaluate the arguments raised in Plaintiff's responses to the motions to dismiss and to research the issues of law and legal authority discussed therein.

10. Additionally, Defendants seek this extension of time due to the associated counsels' other professional obligations and scheduling issues, including those related to the intervening President's Day holiday.

11. On February 19, 2022 and February 21, 2022, Plaintiff's counsel consented via email for Defendants to receive an extension of time, up through and including March 04, 2022,

to file replies in support of their motions to dismiss.

12. Granting Defendant's request for additional time is not done to prejudice any of the parties to this cause of action or to cause undue delay in these proceedings.

WHEREFORE, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law, Spain, Miller Galloway & Lee, LLC and Bernice Haynes respectfully request that this Court enter an Order extending the deadline for them to file Replies in Support of their Motions to Dismiss the Amended Complaint, up through and including March 04, 2022, and for such other relief the Court deems necessary under the circumstances.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

By: /s/ Dustin L. Goldberger
Richard C. Wuestling, #30773MO
Susan M. Dimond, #57434MO
Dustin L. Goldberger, #70080MO
1034 S. Brentwood, Suite 2100
St. Louis, Missouri 63117
Phone: (314) 421-1850
Fax: (314) 421-4346
ruestling@robertsperryman.com
sdimond@robertsperryman.com
dgoldberger@robertsperryman.com

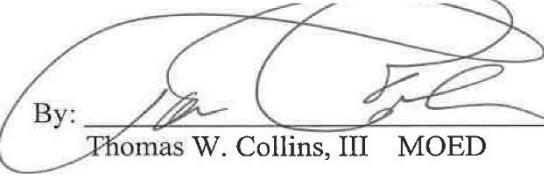
Attorneys for Defendants Jennifer Williams and
Jennifer Williams d/b/a Williams Law

THE LIMBAUGH FIRM
407 N. Kingshighway, P.O. Box 1150
Cape Girardeau, MO 63702-1150
Telephone: (573) 335-3316
Facsimile: (573) 335-1369
Email: jsteffens@limbaughlaw.com

By /s/ John C. Steffens (by consent)
John C. Steffens - #63267

ATTORNEYS FOR DEFENDANT BERNICE
HAYNES

BLANTON, NICKELL, COLLINS,
DOUGLAS & HANSCHEN, L.L.C.
219 South Kingshighway Post Office Box 805
Sikeston, Missouri 63801
PHONE (573) 471-1000 FAX (573) 471-1012
EMAIL: tcollins@blantonlaw.com

By: 
Thomas W. Collins, III MOED
46295MO

Attorneys for Spain, Miller, Galloway & Lee, LLC

(by consent)
CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2022, the foregoing was electronically filed with the Clerk of the Court using CM/ECF electronic filing system which will send notification of such filing to the following and email to all counsel of record:

Laurence D. Mass [laurencedmass@att.net]
Evita Tolu [evitatolu@outlook.com]
Attorneys for Plaintiff

/s/ Susan M. Dimond